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UNITED STATES DISTRICT COURT

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
FILED

WESTERN DISTRICT OF LOUISIANA

JUL 02 1996

SHREVEPORT DIVISION

ROBERT H. SHEMWEILL, CLERK
BY SS DEPUTY

CRYSTAL OIL COMPANY AND
CRYSTAL EXPLORATION AND
PRODUCTION COMPANY,
Plaintiffs,

vs.

ATLANTIC RICHFIELD COMPANY,
Defendant.

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CASE NO. CV95-2115S

JUDGE STAGG

MAGISTRATE JUDGE PAYNE

**JOINT MOTION FOR EXTENSION
OF PRETRIAL FILING DEADLINES**

NOW INTO COURT, through undersigned counsel, come plaintiffs, CRYSTAL OIL COMPANY and CRYSTAL EXPLORATION AND PRODUCTION COMPANY, and defendant, ATLANTIC RICHFIELD COMPANY, who jointly move for an extension of certain pretrial filing deadlines for the following reasons:

1.

The Court's Order issued April 25, 1996 extended the deadline for defendant to respond to discovery requests propounded by plaintiffs and extended the deadline for the filing of any motion for summary judgment to July 31, 1996.

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2.

The parties have diligently conducted written and deposition discovery, but discovery is not complete and cannot be sufficiently completed for the filing of any summary judgment motion by July 31.

3.

On May 30, 1996, defendant served its First Set of Interrogatories to Crystal Oil Company, First Set of Interrogatories to Crystal Exploration and Production Company, First Set of Requests for Admission to Crystal Oil Company and First Set of Requests for Production to Crystal Oil Company. Responses to these discovery requests are due on July 3, 1996.

4.

After several conferences between counsel for the parties concerning these and other discovery matters, the parties have agreed and hereby request that the following new deadlines be established:

August 5, 1996 -- Plaintiffs must serve responses to defendant's discovery requests described in paragraph 2 above.

October 31, 1996 -- Deadline for the filing of any motion for summary judgment.

WHEREFORE, PLAINTIFFS, CRYSTAL OIL COMPANY and CRYSTAL EXPLORATION AND PRODUCTION COMPANY, and DEFENDANT, ATLANTIC RICHFIELD COMPANY, JOINTLY PRAY for an Order extending the deadline for plaintiffs to serve responses to defendant's First Set of Interrogatories to Crystal Oil Company, First Set of Interrogatories to Crystal Exploration and Production Company, First Set of Requests for

Admission to Crystal Oil Company and First Set of Requests for Production to Crystal Oil Company to August 5, 1996; and extending the deadline for the filing of any motion for summary judgment to October 31, 1996.

Shreveport, Louisiana, this 2nd day of July, 1996.

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